



UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

ROMANO GARUBO & ARGENTIERI
Emmanuel J. Argentieri, Esquire/3162
52 Newton Avenue, P.O. Box 456
Woodbury, New Jersey 08096
(856) 384-1515

Attorney for Secured Creditor,
Bosco Credit V Trust Series 2012-1

EDWARD L. BAKER, JR.
xxx-xx-5106
LINDA D. BAKER
xxx-xx-5127

Debtors.

Order Filed on March 7, 2016
by Clerk
U.S. Bankruptcy Court
District of New Jersey

Case No.: 15-20800

Chapter: 13

Judge: KAPLAN

**CONSENT ORDER RESOLVING OBJECTION TO
CONFIRMATION OF PLAN**

The relief set forth on the following pages, numbered two (2) through three (3) is
hereby **ORDERED**.

DATED: March 7, 2016

A handwritten signature in black ink, appearing to read "Michael B. Kaplan".
Honorable Michael B. Kaplan
United States Bankruptcy Judge

(Page 2)

Debtor: Edward and Linda Baker

Case No: 15-20800/MBK

Caption of Order: **CONSENT ORDER RESOLVING OBJECTION TO CONFIRMATION**

Upon consideration of (“Bosco”) Secured Creditor, Bosco Credit V Trust Series 2012-1’s objection to confirmation of Debtors’ Chapter 13 Plan with regard to the mortgage it holds against the property commonly known as 2 Ebony Road, Howell, New Jersey 07731 (“Subject Property”); and the parties having settled their differences and consent to the form, content and entry of the within order; and for good cause shown,

IT IS ORDERED THAT:

1. Debtors shall pay Bosco, its successors and/or assigns, the sum of \$25,000.00 on the second mortgage it holds against the Subject Property as follow:

a) Commencing March 1, 2016, and continuing on the 1st day of each month thereafter until such sum is paid in full, Debtors shall remit \$125.00 to Bosco. Debtors may pre-pay the entire amount due herein at any time provided there is not a default on this Order. No interest shall accrue on the sum due to Bosco hereunder.

b) Payments shall be tendered by Debtors to Bosco as follows:

Bosco
c/o Franklin Credit Management Corporation
PO Box 5147
Carol Stream, IL 60197-5147

(Page 3)

Debtor: Edward and Linda Baker

Case No: 15-20800/MBK

Caption of Order: **CONSENT ORDER RESOLVING OBJECTION TO CONFIRMATION**

2. If the Debtors should default and fail to make the payments as stated herein for more than thirty (30) days from the due date, then Bosco may send a default notice under the Fair Foreclosure Act. If Debtors do not cure the default, then Bosco may commence foreclosure or collection proceedings under the note and mortgage for the full amount due thereunder as Bosco's claim may exist at that time and the terms and conditions of this consent order shall be deemed null and void.

3. All other terms of the note and mortgage remain valid and binding unless expressly modified herein.

4. Bosco's lien will be discharged of record only upon receipt of the final payment of the \$25,000.00 sum referenced in Paragraph 1 herein.

5. The Debtors shall maintain tax payments and insurance on the Subject Property.

We, the undersigned, hereby agree to the form, content and entry of the within consent order:

/S/BRAD J. SPILLER

Brad J. Spiller

Counsel for Debtors

Date: 3/1/16

/S/EMMANUEL J. ARGENTIERI

Emmanuel J. Argentieri

Counsel for Bosco

Date: 3/2/16